

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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VIKRAM P. GROVER d/b/a :

“IX ADVISORS” a/k/a “IXA,” :

:

Plaintiff, :

:

v. :

:

NET SAVINGS LINK, INC., a :

Colorado corporation and formerly :

organized as a Nevada corporation, :

WILTON GROUP, LIMITED, as :

registered in the Isle of Man, U.K., :

WILTON UK (GROUP), LIMITED, as :

registered in England and Wales, U.K., :

CHINA FOOD AND BEVERAGE CO., :

a Colorado corporation, and :

JAMES A. TILTON, :

:

Defendants. :

:

v. :

PACIFIC STOCK TRANSFER, :

NSAVX, INC., a Wyoming corporation, :

JOHN DOE CORP., a/k/a :

NSAVX.COM, a Puerto Rican :

corporation, and JOHN DOES 1-100, :

:

Trustee-Defendants. :

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Civil Action No. 1:21-CV-05054
Honorable Mary M. Rowland

REQUEST FOR HEARING
ON AUGUST 16, 2024

**PLAINTIFF VIKRAM P. GROVER’S NOTICE OF NONCOMPLIANCE
OF DEFENDANT NET SAVINGS LINK, INC. (NSAV) WITH COURT
ORDERS AND REQUEST FOR SANCTIONS AND FINDINGS OF CONTEMPT**

PLEASE TAKE NOTICE that the Plaintiff, Vikram P. Grover d/b/a IX Advisors a/k/a IXA (hereinafter “Mr. Grover” or the “Plaintiff”), respectfully states that the Defendant, Net Savings Link, Inc (hereinafter “NSAV”), its President, Defendant James Tilton (hereinafter “Tilton”), and NSAV’s counsel, have failed and refused to comply with the Orders of this Honorable Court, from

the bench at the virtual hearing on August 8, 2024, and have failed to comply with the Order for a writ of attachment, dated June 26, 2024 (hereinafter the “Attachment Order”) Dkt. No. 167, and the Order for a preliminary injunction and equitable relief, dated June 26, 2024 Dkt. No. 168 (hereinafter the “Injunction Order” and collectively as the “June 26th Orders” or the “Orders”). The Plaintiff states that Defendants NSAV and Tilton have failed to timely file a status report, and have failed to comply with the Orders, and therefore requests sanctions, civil penalties of \$10,000.00 / day upon Defendant NSAV, its President and its counsel, until they have completely cured their violations of the Orders. Mr. Grover also requests that the Court grant his pending Motion to Appoint John Busacca as Chief Restructuring Officer (CRO), with the powers of a receiver, to take charge of the restructuring of Defendant NSAV. *See* Docket, as attached, restated and incorporated by reference as **Exhibit A**. Mr. Grover requests that the Defendants’ violations, noncompliance and sanctions be considered at the hearing on Friday, August 16, 2024.

In support hereof, the Plaintiff states that on August 8, 2024, this Court ordered Defendant NSAV, by and through its President, Defendant Tilton, to comply with the June 26th Orders. As memorialized by the Minute Entry (hereinafter the “August 8th Order”), this Court held as follows:

“... NSAV was admonished that it must *IMMEDIATELY comply* with the Court's prior orders dated 6/26/24 [167] [168]. By 8/14/24 at 4:00 CST, Defendant NSAV *shall file a status report updating the Court on its compliance with the prior orders*. Specifically, NSAV must "identify and describe, in complete detail, with all relevant information, writing and under oath, by an authorized officer of each such Defendant and Enjoined Defendant, the custodian, location amount, and all complete details, data and information, as to any and all shares of common stock and/or other classes of stock of each Defendant and Enjoined Defendant, as held from September 23, 2021 to the date of the Order, and deliver any and all documentation regarding, relating or supporting the same, by Defendant NSAV and as certified, under oath and by the pains and penalties of perjury, by the Chief Executive Officer of Defendant NSAV" and "identify and describe, in complete detail, with all relevant information, writing and under oath, by an authorized officer of each such Defendant and Enjoined Defendant, the custodian, location amount, and all complete details, data and information, as to any and all assets, monies, credits, rights, contracts and/or things, tangible and/or intangible, that have

been removed, sold, encumbered, hypothecated, conveyed, transferred, assigned and/or moved, directly or indirectly, from the Defendants and the Defendant–Agents since the commencement of this litigation..."

Minute Entry, Dkt No. 196, dated August 8, 2024 (emphasis added). For the Court's convenience, a copy of the August 8th Order is attached restated and incorporated by reference as **Exhibit B.**

The Plaintiff states that as of the ECF filing of the instant Notice, Defendant NSAV and its President, Defendant Tilton, and NSAV's counsel, have failed to file a status report and have failed to comply, in any respect whatsoever, with the Court August 8th Order or the June 26th Orders. *See* Affidavit of Philip M. Giordano, Esq., as attached, restated and incorporated by reference herein (hereinafter the "Giordano Affidavit").

With the Defendants' continued violation of the Orders, the Plaintiff requests sanctions, civil contempt of \$10,000.00 / day and penalties upon Defendant NSAV, its President and its counsel until they have completely cured their violations of this Court's Orders. The Plaintiff further requests that the Court grant his pending Motion to Appoint John Busacca as Chief Restructuring Officer (CRO), with the powers of a receiver for the restructuring of NSAV. The Plaintiff requests that the Defendants' violations and sanctions be considered on August 16th.

Dated: August 14, 2024

Respectfully submitted,
PLAINTIFF, Vikram P. Grover,

By his Attorneys,

/s/ Philip M. Giordano
Philip M. Giordano, Esq. (admitted *pro hac vice*)
Giordano & Company, P.C.
REED & GIORDANO, P.A.
One McKinley Square, 6th Floor
Boston, Massachusetts 02109-2724
Telephone: (617) 723-7755
Facsimile: (617) 723-7756
Email: pgiordano@reedgiordano.com

CERTIFICATE OF SERVICE

I, Philip M. Giordano, do hereby certify that on the 14th day of August, 2024, I caused to be served a true and correct copy of Plaintiff Vikram P. Grover's Notice of Noncompliance and Requests for Sanctions by Defendant Net Savings Link, Inc. (NSAV), with **Exhibits A-B**, and the Giordano Affidavit, as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all parties or counsel of record, and by emailing a true copy of the same to the following:

James A Tilton, *pro se*
c/o Net Savings Link, Inc.
1942 Broadway Street, Suite 314C
Boulder, CO 80302
Email: jamtilton@yahoo.com

Jawad I. Fitter, Esq. (Local Counsel Defendant NSAV)
Bar ID Number: 6331338
Fitter Law, LLC
150 S. Wacker Drive, Suite 2400
Chicago, IL 60606
Tel: 312-741-1073
Email: Jawad@FitterLaw.com

Andrew Roman Perrong, Esq. (for prospective *Intervenor*)
Perrong Law LLC
2657 Mt. Carmel Ave
Glenside, PA 19038
Tel: (215) 225-5529
Email: a@perronglaw.com

Jeffrey R. Tone, Esq. (Local Counsel for Plaintiff)
KATTEN & TEMPLE, LLP
The Rookery Building
209 South LaSalle Street, Suite 950
Chicago, Illinois 60604
Telephone: (312) 663-4400
Email: jtone@kattentemple.com

Dated: August 14, 2024

/s/ Philip M. Giordano
Philip M. Giordano

Exhibit “A”

United States District Court
Northern District of Illinois - CM/ECF NextGen 1.7.1.1 (Chicago)
CIVIL DOCKET FOR CASE #: 1:21-cv-05054

Grover v. Net Savings Link, Inc. et al
Assigned to: Honorable Mary M. Rowland
Demand: \$75,000
Cause: 28:1332 Diversity-Other Contract

Date Filed: 09/23/2021
Jury Demand: Plaintiff
Nature of Suit: 190 Contract: Other
Jurisdiction: Diversity

Plaintiff

Vikram P Grover
doing business as
IX Advisors aka IXA

represented by **Philip M. Giordano**
Giordano & Company, P.C.
One McKinley Square, 6th Floor
Boston, MA 02109
617-723-7755
Fax: 617-723-7756
Email: pgiordano@reedgiordano.com
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Jeffrey R. Tone
Katten & Temple LLP
209 S. LaSalle Street
Suite 950
Chicago, IL 60604
312 663 0800
Fax: Active
Email: jtone@kattentemple.com
ATTORNEY TO BE NOTICED

V.

Defendant

Net Savings Link, Inc.
a Colorado corporation and formerly
organized as a Nevada corporation

represented by **Edward S Stone**
Edward Stone Law PC
175 West Putnam Avenue
Suite 2
Greenwich, CT 06830
(203) 504-8425
Fax: Pro Hac Vice
Email: eddie@edwardstonelaw.com
TERMINATED: 06/16/2023
LEAD ATTORNEY
PRO HAC VICE

Jawad Fitter
Fitter Law, LLC
150 S. Wacker Drive

Suite 2400
Chicago, IL 60606
(312) 741-1073
Fax: Not a member
Email: jawad@fitterlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Catherine Simmons-Gill
Offices of Catherine Simmons-Gill, LLC
111 West Washington Street
Suite 1110
Chicago, IL 60602
(312) 609-6611
Fax: Active
Email: simmonsgill@gmail.com
TERMINATED: 06/16/2023

Defendant

Wilton Group, Limited
as registered in the Isle of Man, U.K.

represented by **Wilton Group, Limited**
PRO SE

Edward S Stone
(See above for address)
TERMINATED: 06/16/2023
LEAD ATTORNEY
PRO HAC VICE

Catherine Simmons-Gill
(See above for address)
TERMINATED: 06/16/2023

Defendant

Wilton UK (Group), Limited
as registered in England and Wales, U.K.

represented by **Wilton UK (Group), Limited**
PRO SE

Edward S Stone
(See above for address)
TERMINATED: 06/16/2023
LEAD ATTORNEY
PRO HAC VICE

Catherine Simmons-Gill
(See above for address)
TERMINATED: 06/16/2023

Defendant

China Food and Beverage Company
a Colorado corporation

represented by **China Food and Beverage Company**
PRO SE

Edward S Stone
(See above for address)
TERMINATED: 06/16/2023
LEAD ATTORNEY

*PRO HAC VICE***Catherine Simmons-Gill**

(See above for address)

*TERMINATED: 06/16/2023***Defendant****James A Tilton**represented by **James A Tilton**

c/o Net Savings Link, Inc.

1942 Broadway Street, Suite 314C

Boulder, CO 80302

Email: jamtilton@yahoo.com

PRO SE

Edward S Stone

(See above for address)

*TERMINATED: 06/16/2023**LEAD ATTORNEY**PRO HAC VICE***Catherine Simmons-Gill**

(See above for address)

*TERMINATED: 06/16/2023***Defendant****John Does 1-100****Intervenor****WFD CAPITAL LLC**represented by **Andrew Roman Perrong**

Perrong Law Llc

2657 Mt Carmel Ave

Glenside, PA 19038

(215) 225-5529

Fax: Not a member

Email: a@perronglaw.com

*LEAD ATTORNEY**ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
09/23/2021	<u>1</u>	COMPLAINT filed by Vikram P Grover; Jury Demand. Filing fee \$ 402, receipt number 0752-18700838. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G, # <u>8</u> Exhibit H, # <u>9</u> Exhibit I, # <u>10</u> Exhibit J, # <u>11</u> Exhibit K, # <u>12</u> Exhibit L, # <u>13</u> Exhibit M, # <u>14</u> Exhibit N, # <u>15</u> Exhibit O, # <u>16</u> Exhibit P, # <u>17</u> Exhibit Q, # <u>18</u> Exhibit R, # <u>19</u> Exhibit S, # <u>20</u> Civil Cover Sheet)(Tone, Jeffrey) (Entered: 09/23/2021)
09/23/2021	<u>2</u>	CIVIL Cover Sheet (Tone, Jeffrey) (Entered: 09/23/2021)
09/23/2021	<u>3</u>	ATTORNEY Appearance for Plaintiff Vikram P Grover by Jeffrey R. Tone (Tone, Jeffrey) (Entered: 09/23/2021)
09/23/2021		CASE ASSIGNED to the Honorable Mary M. Rowland. Designated as Magistrate Judge the Honorable Maria Valdez. Case assignment: Random assignment. (lma,) (Entered: 09/23/2021)

		09/23/2021)
09/24/2021		SUMMONS Issued as to Defendants China Food and Beverage Company, Net Savings Link, Inc., James A Tilton, Wilton Group, Limited, Wilton UK (Group), Limited (ak,) (Entered: 09/24/2021)
09/24/2021	<u>4</u>	MINUTE entry before the Honorable Mary M. Rowland: In light of Plaintiff's invocation of diversity jurisdiction as the basis for federal jurisdiction, on or before 10/20/21, Plaintiff shall file a jurisdictional supplement, as a separate docket entry. Plaintiff is reminded that allegations based upon "information and belief" are insufficient to establish diversity jurisdiction in the Seventh Circuit, see <i>Brickstructures, Inc. v. Coaster Dynamix, Inc.</i> , 2017 WL 4310671, at *1 (N.D. Ill. Sept. 28, 2017); <i>Ferolie Corp. v. Advantage Sales & Mktg., LLC</i> , No. 04 C 5425, 2004 WL 2433114, at *1 (N.D. Ill. Oct. 28, 2004), and that for individuals, citizenship means domicile, not residence, <i>Am.'s Best Inns, Inc. v. Best Inns of Abilene, L.P.</i> , 980 F.2d 1072, 1074 (7th Cir. 1992). If Plaintiff fails to file a timely jurisdictional supplement, this case may be dismissed for lack of subject matter jurisdiction. Mailed notice. (dm,) (Entered: 09/24/2021)
10/18/2021	<u>5</u>	MINUTE entry before the Honorable Mary M. Rowland : On or before 12/7/21, the parties shall file a joint initial status report. A template for the Initial Status Report, setting forth the information required, may be found at http://www.ilnd.uscourts.gov/Judges.aspx by clicking on Judge Rowland's name and then again on the link entitled 'Initial Status Conference.' The litigants are further ordered to review all of Judge Rowland's standing orders and the information available on her webpage. The court will enter a scheduling order in response. Mailed notice. (dm,) (Entered: 10/18/2021)
10/20/2021	<u>6</u>	SUPPLEMENT to <i>PLAINTIFF GROVER'S JURISDICTIONAL SUPPLEMENT</i> (Tone, Jeffrey) (Entered: 10/20/2021)
10/20/2021	<u>7</u>	MINUTE entry before the Honorable Mary M. Rowland:Plaintiff having established <u>6</u> , at least for pleading purposes, that there is complete diversity, Plaintiff has complied with this Court's order <u>4</u> requiring a jurisdictional supplement as to subject matter jurisdiction. Mailed notice. (dm,) (Entered: 10/20/2021)
10/21/2021	<u>8</u>	MOTION for Leave to Appear Pro Hac Vice Filing fee \$ 150, receipt number 0752-18792394. <i>with Certificate of Service</i> (Giordano, Philip) (Entered: 10/21/2021)
10/22/2021	<u>9</u>	MINUTE entry before the Honorable Mary M. Rowland: Motion to appear pro hac vice by Philip Matthew Giordano <u>8</u> is granted. Counsel is reminded to become familiar with this court's local rules (including the rules requiring local counsel and describing this court's trial bar). Mailed notice. (dm,) (Entered: 10/22/2021)
10/22/2021	<u>10</u>	ATTORNEY Appearance for Plaintiff Vikram P Grover by Philip M. Giordano <i>with Certificate of Service</i> (Giordano, Philip) (Entered: 10/22/2021)
12/03/2021	<u>11</u>	SUMMONS Returned Executed by Vikram P Grover as to Wilton Group, Limited on 12/1/2021, answer due 12/22/2021. (Giordano, Philip) (Entered: 12/03/2021)
12/03/2021	<u>12</u>	AFFIDAVIT of Service filed by Plaintiff Vikram P Grover regarding Summons & Complaint <i>as to Wilton Group Limited, in Isle of Man, UK</i> served on Lynsey Hignett on 12/3/2021 (Giordano, Philip) (Entered: 12/03/2021)
12/03/2021	<u>13</u>	SUMMONS Returned Executed by Vikram P Grover as to Wilton UK (Group), Limited on 12/1/2021, answer due 12/22/2021. (Giordano, Philip) (Entered: 12/03/2021)
12/03/2021	<u>14</u>	AFFIDAVIT of Service filed by Plaintiff Vikram P Grover regarding Summons & Complaint <i>as to Defendant Net Savings Link, Inc.</i> served on Defendant NSAV's Registered Agent on 12/2/2021 (Giordano, Philip) (Entered: 12/03/2021)

12/03/2021	<u>15</u>	AFFIDAVIT of Service filed by Plaintiff Vikram P Grover regarding Summons & Complaint <i>as to Defendant China Food & Beverage Co.</i> served on Defendant China Food's Registered Agent on 12/2/2021 (Giordano, Philip) (Entered: 12/03/2021)
12/06/2021	<u>16</u>	MINUTE entry before the Honorable Mary M. Rowland: The deadline of 12/7/21 for parties to file a joint initial status report <u>5</u> is re-set to 1/7/22. Mailed notice. (dm,) (Entered: 12/06/2021)
12/10/2021	<u>17</u>	SUMMONS Returned Executed by Vikram P Grover as to James A Tilton on 12/8/2021, answer due 12/29/2021. (Giordano, Philip) (Entered: 12/10/2021)
12/23/2021	<u>18</u>	MOTION by Plaintiff Vikram P Grover for entry of default <i>Pursuant to Rule 55(a) as to Defendant Wilton UK (Group), Limited, with a Certificate of Service</i> (Attachments: # <u>1</u> Affidavit of Philip M. Giordano, Esq., # <u>2</u> Exhibit A)(Giordano, Philip) (Entered: 12/23/2021)
12/23/2021	<u>19</u>	MOTION by Plaintiff Vikram P Grover for entry of default <i>Pursuant to Rule 55(a) as to Defendant Wilton Group, Limited, with a Certificate of Service</i> (Attachments: # <u>1</u> Affidavit of Philip M. Giordano, Esq., # <u>2</u> Exhibit A, # <u>3</u> Exhibit B)(Giordano, Philip) (Entered: 12/23/2021)
12/24/2021	<u>20</u>	MOTION by Plaintiff Vikram P Grover for entry of default <i>Pursuant to Rule 55(a) as to Defendant Net Savings Link, Inc., with a Certificate of Service</i> (Attachments: # <u>1</u> Affidavit of Philip M. Giordano, Esq., # <u>2</u> Exhibit A)(Giordano, Philip) (Entered: 12/24/2021)
12/24/2021	<u>21</u>	MOTION by Plaintiff Vikram P Grover for entry of default <i>Pursuant to Rule 55(a) as to Defendant China Food and Beverage Co., with a Certificate of Service</i> (Attachments: # <u>1</u> Affidavit of Philip M. Giordano, Esq., # <u>2</u> Exhibit A)(Giordano, Philip) (Entered: 12/24/2021)
12/30/2021	<u>22</u>	MOTION by Plaintiff Vikram P Grover for entry of default <i>Pursuant to Rule 55(a) as to Defendant James A. Tilton, with a Certificate of Service</i> (Attachments: # <u>1</u> Affidavit of Philip M. Giordano, Esq., # <u>2</u> Exhibit A)(Giordano, Philip) (Entered: 12/30/2021)
01/07/2022	<u>23</u>	STATUS Report <i>as Initial Status Report filed</i> , by Vikram P Grover (Giordano, Philip) (Entered: 01/07/2022)
01/13/2022	<u>24</u>	MINUTE entry before the Honorable Mary M. Rowland: Telephonic status hearing set for 1/19/22 at 9:30am. Parties shall call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 01/13/2022)
01/19/2022	<u>25</u>	MINUTE entry before the Honorable Mary M. Rowland: Telephonic status hearing held. Plaintiff's counsel appeared telephonically. Defendants did not appear. Plaintiff reported on the status of this case and service on Defendants. Plaintiff has not had any communication with defendants. For the reasons stated on the record, Plaintiff's request for entry of default pursuant to rule 55(a) against Defendants Net Savings Link, Inc., Wilton Group, Limited, Wilton UK (Group), Limited, China Food and Beverage Company, and James A Tilton <u>18</u> , <u>19</u> , <u>20</u> , <u>21</u> , and <u>22</u> are granted. Orders to follow. Mailed notice. (dm,) (Entered: 01/19/2022)
01/19/2022	<u>26</u>	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's Motion for FRCP 55(a) default (Dkt. 18) is granted. Default is entered against defendant Wilton UK (Group), Limited. The Court will vacate this default if Defendant files a response by 2/11/22. Plaintiff is to send a copy of this order and the default filings as to defendant Wilton UK (Group), Limited via FedEx and file on the docket proof of service. By 2/25/22, Plaintiff shall file a status report or motion pursuant to FRCP 55(b). Mailed notice. (dm,) (Entered: 01/19/2022)

01/19/2022	27	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's Motion for FRCP 55(a) default (Dkt. 19) is granted. Default is entered against defendant Wilton Group Limited. The Court will vacate this default if Defendant files a response by 2/11/22. Plaintiff is to send a copy of this order and the default filings as to defendant Wilton UK (Group), Limited via FedEx and file on the docket proof of such service. By 2/25/22, Plaintiff shall file a status report or motion pursuant to FRCP 55(b). Mailed notice. (dm,) (Entered: 01/19/2022)
01/19/2022	28	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's Motion for FRCP 55(a) default (Dkt. 20) is granted. Default is entered against defendant Net Savings Link, Inc. The Court will vacate this default if Defendant files a response by 2/11/22. Plaintiff is to send a copy of this order and the default filings as to defendant via First Class Mail and file proof of mailing on the docket. By 2/25/22, Plaintiff shall file a status report or motion pursuant to FRCP 55(b). Mailed notice. (dm,) (Entered: 01/19/2022)
01/19/2022	29	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's Motion for FRCP 55(a) default (Dkt. 21) is granted. Default is entered against defendant China Food and Beverage, Co. The Court will vacate this default if Defendant files a response by 2/11/22. Plaintiff is to send a copy of this order and the default filings as to defendant China Food and Beverage, Co. via First Class Mail file proof of service on the docket. By 2/25/22, Plaintiff shall file a status report or motion pursuant to FRCP 55(b). Mailed notice. (dm,) (Entered: 01/19/2022)
01/19/2022	30	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's Motion for FRCP 55(a) default (Dkt. 22) is granted. Default is entered against defendant James Tilton. The Court will vacate this default if Defendant files a response by 2/11/22. Plaintiff is to send a copy of this order and the default filings as to defendant Tilton via First Class Mail and file proof of service on the docket. By 2/25/22, Plaintiff shall file a status report or motion pursuant to FRCP 55(b). Mailed notice. (dm,) (Entered: 01/19/2022)
01/28/2022	31	AFFIDAVIT of Philip M. Giordano, Esq. regarding text entry,, 27 , order on motion for entry of default,,,,,,,,,,,,, terminate deadlines,,, status hearing,, 25 , text entry,, 29 , set deadlines,, 26 , text entry,, 28 , text entry,, 30 <i>in Compliance with this Honorable Court's Orders of January 19, 2022 as to Service and Notice to Defendants of Orders Granting Rule 55(a) Entries of Default against Each Defendant, together with Exhibits, with Certificate of Service</i> (Attachments: # 1 Exhibit A, # 2 Exhibit B)(Giordano, Philip) (Entered: 01/28/2022)
02/10/2022	32	ATTORNEY Appearance for Defendants Net Savings Link, Inc., James A Tilton by Catherine Simmons-Gill <i>local counsel</i> (Simmons-Gill, Catherine) (Entered: 02/10/2022)
02/10/2022	33	ATTORNEY Appearance for Defendant China Food and Beverage Company by Catherine Simmons-Gill <i>local counsel</i> (Simmons-Gill, Catherine) (Entered: 02/10/2022)
02/10/2022	34	MOTION for Leave to Appear Pro Hac Vice Filing fee \$ 150, receipt number 0752-19143035. (Stone, Edward) (Entered: 02/10/2022)
02/11/2022	35	MINUTE entry before the Honorable Mary M. Rowland: Motion to appear pro hac vice by Edward S. Stone 34 is granted. Counsel is reminded to become familiar with this court's local rules (including the rules requiring local counsel and describing this court's trial bar). Mailed notice. (dm,) (Entered: 02/11/2022)
02/11/2022	36	ANSWER to Complaint by China Food and Beverage Company, Net Savings Link, Inc., James A Tilton(Simmons-Gill, Catherine) (Entered: 02/11/2022)
02/11/2022	37	NOTIFICATION of Affiliates pursuant to Local Rule 3.2 by China Food and Beverage Company, Net Savings Link, Inc. (Simmons-Gill, Catherine) (Entered: 02/11/2022)

02/12/2022	<u>38</u>	ATTORNEY Appearance for Defendants China Food and Beverage Company, Net Savings Link, Inc., James A Tilton by Edward S Stone (Stone, Edward) (Entered: 02/12/2022)
02/25/2022	<u>39</u>	STATUS Report <i>by Plaintiff Vikram P. Grover, with a Certificate of Service</i> by Vikram P Grover (Giordano, Philip) (Entered: 02/25/2022)
02/28/2022	<u>40</u>	MINUTE entry before the Honorable Mary M. Rowland: The court has reviewed Plaintiff's second and thorough status report. The court vacates the defaults entered on 1/19/21 pursuant to FRCP 55(a) against Wilton UK (Group), Limited, Wilton Group Limited, Net Savings Link, Inc, China Food and Beverage, Co, and James Tilton. See docket 26-30. The parties shall file a JOINT status report by 3/22/22. Mailed notice. (dm,) (Entered: 02/28/2022)
03/22/2022	<u>41</u>	STATUS Report <i>and Proposed Rule 26(f) Scheduling Statement, filed on Joint basis by Plaintiff Vikram Grover and Defendants Net Savings Link, Inc., China Food and Beverage Co., and James Tilton, with Certificate of Service</i> , by Vikram P Grover (Giordano, Philip) (Entered: 03/22/2022)
03/23/2022	<u>42</u>	MINUTE entry before the Honorable Mary M. Rowland: The court has reviewed the joint status report. The court adopts the parties' proposed discovery schedule as follows: amendment of pleadings to be completed by 4/29/22; initial disclosures to be exchanged by 5/31/22. Fact discovery to close on 10/14/22. Telephonic status set for 6/23/22 at 9:30 AM. Parties should call 866-434-5269; access code 3751971. The court notes that Net Savings/China Food/Tilton defendants believe a settlement conference would be productive. Parties are to continue discussing this option as early resolution is often a wise option. The court will want to discuss this at the status. The Court will also want an update on the Wilton Group Defendants. Mailed notice. (dm,) (Entered: 03/23/2022)
05/24/2022	<u>43</u>	MOTION by Defendants China Food and Beverage Company, John Does 1-100, Net Savings Link, Inc., James A Tilton for extension of time to complete discovery <i>Joint Motion</i> (Simmons-Gill, Catherine) (Entered: 05/24/2022)
05/25/2022	<u>44</u>	MINUTE entry before the Honorable Mary M. Rowland: Joint motion to extend various deadlines <u>43</u> is granted in order to continue settlement efforts. The date for initial disclosures is extended to 6/30/22. Fact discovery is extended to November 14, 2022 Telephone status set for 6/23/22 is stricken and re-set to July 25, 2022 at 9:30am. Parties should call 866-434-5269; access code 3751971. The court notes defendant Wilton Group/Wilton UK has not been served or entered an appearance as yet. Parties should be prepared to address this issue at the status in July, if the matter is not resolved prior to that. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. Violation of these prohibitions may result in sanctions, including removal of court issued media credentials, restricted entry to future hearings, denial of entry to future hearings, or any other sanctions deemed necessary by the Court. Mailed notice. (dm,) (Entered: 05/25/2022)
06/22/2022	<u>45</u>	MOTION by Defendants China Food and Beverage Company, John Does 1-100, Net Savings Link, Inc., James A Tilton for extension of time to complete discovery <i>Joint Motion</i> (Simmons-Gill, Catherine) (Entered: 06/22/2022)
06/23/2022	<u>46</u>	MINUTE entry before the Honorable Mary M. Rowland: Joint motion to extend various deadlines <u>45</u> is granted in order to continue settlement discussions. The date for initial disclosures is extended to 8/1/22. Telephone status set for 7/25/22 is stricken and re-set to 8/25/22 at 9:30am. Parties should call 866-434-5269; access code 3751971. The court notes defendant Wilton Group/Wilton UK has not been served or entered an appearance as yet. Parties should be prepared to address this issue at the status in August, if the matter

		is not resolved prior to that. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. Violation of these prohibitions may result in sanctions, including removal of court issued media credentials, restricted entry to future hearings, denial of entry to future hearings, or any other sanctions deemed necessary by the Court. Mailed notice. (dm,) (Entered: 06/23/2022)
08/24/2022	47	ATTORNEY Appearance for Defendants Wilton Group, Limited, Wilton UK (Group), Limited by Catherine Simmons-Gill <i>appearance as local counsel</i> (Simmons-Gill, Catherine) (Entered: 08/24/2022)
08/24/2022	48	ATTORNEY Appearance for Defendants Wilton Group, Limited, Wilton UK (Group), Limited by Edward S Stone (Stone, Edward) (Entered: 08/24/2022)
08/25/2022	49	MINUTE entry before the Honorable Mary M. Rowland: Telephonic status hearing held. Counsel appeared telephonically. Defendants' initial disclosures are due 9/16/22. Fact discovery is extended to 3/31/23. Parties believe a settlement conference would be productive. Accordingly, this matter is referred to the magistrate judge for settlement purposes. Telephonic status hearing set for 11/30/22 at 9:30am. Parties should call 866-434-5269; access code 3751971. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. Violation of these prohibitions may result in sanctions, including removal of court issued media credentials, restricted entry to future hearings, denial of entry to future hearings, or any other sanctions deemed necessary by the Court. Mailed notice. (dm,) (Entered: 08/25/2022)
08/25/2022	50	Pursuant to Local Rule 72.1, this case is hereby referred to the calendar of Honorable Maria Valdez for the purpose of holding proceedings related to: settlement conference. (dm,)Mailed notice. (Entered: 08/25/2022)
08/25/2022	51	MINUTE entry before the Honorable Maria Valdez: This case has been referred to Judge Valdez to conduct a settlement conference. Plaintiff is to submit a demand letter to Defendant no later than 9/8/22, and Defendant will respond with an offer letter by 9/22/22. Both letters must comply with this Court's standing order and instructions governing settlement conferences and should be electronically submitted to the Court at Proposed_Order_Valdez@ilnd.uscourts.gov no later than 9/23/22. If after reviewing the letters the Court believes a settlement conference will be fruitful, the parties will be contacted with available dates. Mailed notice (lp,) (Entered: 08/25/2022)
09/20/2022	52	MOTION by Defendants Wilton UK (Group), Limited, Wilton Group, Limited to dismiss for lack of jurisdiction <i>and failure to state a claim</i> (Attachments: # 1 Declaration of Theunis Bassage)(Simmons-Gill, Catherine) (Entered: 09/20/2022)
09/20/2022	53	NOTICE by Wilton Group, Limited, Wilton UK (Group), Limited re MOTION by Defendants Wilton UK (Group), Limited, Wilton Group, Limited to dismiss for lack of jurisdiction <i>and failure to state a claim</i> 52 (Simmons-Gill, Catherine) (Entered: 09/20/2022)
09/21/2022	54	MINUTE entry before the Honorable Mary M. Rowland: Because this case is referred for settlement, the court will set a long briefing schedule. If parties agree to stay briefing because of settlement efforts, they should file an agreed motion. Response to motion to dismiss 52 due 11/2/22; reply due 11/30/22. Mailed notice. (dm,) (Entered: 09/21/2022)
09/30/2022	55	MINUTE entry before the Honorable Maria Valdez: Remote attorneys-only settlement conference is set for 10/20/22 at 11:00 a.m. The Webex link will be sent at a later date, and counsel shall advise chambers as soon as possible if their contact information changes before the conference. Final settlement positions are due by 10/18/22. Failure to comply with the provisions of the Court's Standing Order may result in the unilateral

		cancellation of the settlement conference by the Court. THE FACT THAT A SETTLEMENT CONFERENCE HAS BEEN SCHEDULED DOES NOT MEAN THAT THE PARTIES SHOULD STOP ENGAGING IN SETTLEMENT DISCUSSIONS AMONG THEMSELVES. The Court finds that too often the parties put settlement talks on hold until the settlement conference with the Magistrate Judge. The Court expects that many cases can be resolved among the parties without the need for court-supervised mediation. If your informal discussions are unsuccessful, the Court will conduct the conference but will expect the parties to apprise her of the status of their ongoing settlement discussions. Because of the volume of settlement conferences conducted by Judge Valdez, once a settlement conference date has been agreed upon, no continuance will be granted without a motion showing extreme hardship. Mailed notice (lp,) (Entered: 09/30/2022)
10/04/2022	<u>56</u>	MINUTE entry before the Honorable Maria Valdez: The settlement conference set for 10/20/22 at 11:00 a.m. is reset to 11:15 a.m. the same day. Mailed notice (lp,) (Entered: 10/04/2022)
10/20/2022	<u>57</u>	MINUTE entry before the Honorable Maria Valdez: Attorneys-only settlement conference held on 10/20/22. A judicial recommendation of settlement was made. No later than 3:00 p.m. on 10/21/22, the parties are to separately call chambers at 312-435-5690 x 3 and leave a voice mail advising whether the recommendation is accepted. Mailed notice (lp,) (Entered: 10/20/2022)
10/21/2022	<u>58</u>	MINUTE entry before the Honorable Maria Valdez: The parties have accepted the judicial recommendation, and a binding settlement has been reached. Dismissal documents are to be filed with the District Judge. All matters relating to the referral of this action having been resolved, the case is returned to the assigned judge. Mailed notice. (jj,) (Entered: 10/21/2022)
10/24/2022	<u>59</u>	MINUTE entry before the Honorable Mary M. Rowland: In light of Judge Valdez's order, the court denies defendants' motion to dismiss <u>52</u> as moot. Telephonic status remains set for 11/30/22. <u>49</u> Status will be stricken if a stipulation to dismiss is filed prior to that date. Mailed notice. (dm,) (Entered: 10/24/2022)
11/29/2022	<u>60</u>	MOTION by Plaintiff Vikram P Grover for order of <i>Short Order of Notice, with Certificate of Service</i> (Giordano, Philip) (Entered: 11/29/2022)
11/29/2022	<u>61</u>	MOTION by Plaintiff Vikram P Grover to set aside and <i>Terminate Nisi Order and Restore Litigation to Active Docket, with Certificate of Service</i> (Giordano, Philip) (Entered: 11/29/2022)
11/29/2022	<u>62</u>	MOTION by Plaintiff Vikram P Grover for sanctions , <i>Contempt, Attorney's Fees and to Enforce Binding Settlement Term Sheet, with Certificate of Service</i> (Giordano, Philip) (Entered: 11/29/2022)
11/29/2022	<u>63</u>	MOTION by Plaintiff Vikram P Grover for writ of garnishment , <i>Attachment of Defendants' Assets, and Attachment by Trustee Process of Defendant NSAV's Freely Tradeable Shares, as held by Nominee-Defendant, Pacific Stock Transfer, Inc., as Transfer Agent, with Certificate of Service</i> (Giordano, Philip) (Entered: 11/29/2022)
11/29/2022	<u>64</u>	AFFIDAVIT of Philip M. Giordano, Esq. regarding motion for order <u>60</u> , motion for sanctions <u>62</u> , motion for writ of garnishment, <u>63</u> , motion to set aside <u>61</u> <i>with Exhibits A-E, and with a Certificate of Service</i> (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E)(Giordano, Philip) (Entered: 11/29/2022)
11/29/2022	<u>65</u>	MEMORANDUM by Vikram P Grover in support of motion for order <u>60</u> , motion for sanctions <u>62</u> , motion for writ of garnishment, <u>63</u> , motion to set aside <u>61</u> <i>in Support of Emergency Motions for Contempt, Sanctions, Attorney's Fees, to Enforce Binding</i>

		<i>Settlement Term Sheet, Terminate Nisi and Restore to Active Docket, and for Short Order of Notice, with Certificate of Service</i> (Giordano, Philip) (Entered: 11/29/2022)
11/30/2022	66	MINUTE entry before the Honorable Mary M. Rowland: Telephonic status hearing held. Counsel appeared telephonically. Parties are at odds over the terms of the settlement agreement. This matter is referred to the magistrate judge for settlement purposes. Mailed notice. (dm,) (Entered: 11/30/2022)
11/30/2022	67	Pursuant to Local Rule 72.1, this case is hereby referred to the calendar of Honorable Maria Valdez for the purpose of holding proceedings related to: settlement conference. (dm,)Mailed notice. (Entered: 11/30/2022)
11/30/2022	68	MINUTE entry before the Honorable Mary M. Rowland: Parties are to file a status report on settlement by 1/6/23. Mailed notice. (dm,) (Entered: 11/30/2022)
12/01/2022	69	<p>TRANSCRIPT OF PROCEEDINGS held on 11/30/22 before the Honorable Mary M. Rowland. Telephonic status hearing. Order Number: 44702. Court Reporter Contact Information: Laura Renke, OfficialTranscript@gmail.com, 312.435.6053.</p> <p>IMPORTANT: The transcript may be viewed at the court's public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through the Court Reporter/Transcriber or PACER. For further information on the redaction process, see the Court's web site at www.ilnd.uscourts.gov under Quick Links select Policy Regarding the Availability of Transcripts of Court Proceedings.</p> <p>Redaction Request due 12/22/2022. Redacted Transcript Deadline set for 1/2/2023. Release of Transcript Restriction set for 3/1/2023. (Renke, Laura) (Entered: 12/01/2022)</p>
12/01/2022	70	MINUTE entry before the Honorable Maria Valdez: This case has been referred to Judge Valdez to conduct a settlement conference. Plaintiff is to submit an updated demand letter to Defendant no later than 12/5/22, and Defendant will respond with an offer letter by 12/8/22. Both letters must comply with this Court's standing order and instructions governing settlement conferences and should be electronically submitted to the Court at Proposed_Order_Valdez@ilnd.uscourts.gov no later than 12/9/22. If after reviewing the letters the Court believes a settlement conference will be fruitful, the parties will be contacted with available dates. Mailed notice (smm,) (Entered: 12/01/2022)
12/09/2022	71	MINUTE entry before the Honorable Maria Valdez: Remote settlement status hearing is set for 12/15/22 at 11:00 a.m. CST. A Webex link has been sent directly to counsel, and they are to advise chambers as soon as possible if their contact information changes before the hearing. Mailed notice (lp,) (Entered: 12/09/2022)
12/15/2022	72	MINUTE entry before the Honorable Maria Valdez: Settlement status hearing held on 12/15/22. The parties are to continue discussing whether the terms memorialized in the 10/21/22 settlement term sheet can be met. A joint status report on those negotiations shall be submitted no later than 12/27/22 to Proposed_Order_Valdez@ilnd.uscourts.gov . Mailed notice (lp,) (Entered: 12/15/2022)
12/29/2022	73	ANNUAL REMINDER: Pursuant to Local Rule 3.2 (Notification of Affiliates) , any nongovernmental party, other than an individual or sole proprietorship, must file a statement identifying all its affiliates known to the party after diligent review or, if the party has identified no affiliates, then a statement reflecting that fact must be filed. An affiliate is defined as follows: any entity or individual owning, directly or indirectly (through ownership of one or more other entities), 5% or more of a party. The statement is to be electronically filed as a PDF in conjunction with entering the affiliates in CM/ECF as prompted. As a reminder to counsel, parties must supplement their statements of

		affiliates within thirty (30) days of any change in the information previously reported. This minute order is being issued to all counsel of record to remind counsel of their obligation to provide updated information as to additional affiliates if such updating is necessary. If counsel has any questions regarding this process, this LINK will provide additional information. Signed by the Executive Committee on 12/29/2022: Mailed notice. (tg,) (Entered: 12/29/2022)
01/06/2023	74	STATUS Report <i>Joint Status Report</i> by China Food and Beverage Company, John Does 1-100, Net Savings Link, Inc., James A Tilton, Wilton Group, Limited, Wilton UK (Group), Limited (Simmons-Gill, Catherine) (Entered: 01/06/2023)
01/10/2023	75	MINUTE entry before the Honorable Mary M. Rowland: On 11/29/22 Plaintiff filed a motion captioned Emergency Motion for Contempt, Sanctions, Attorney's Fees, and to Enforce Binding Settlement Term Sheet Against Defendant. 62 The plaintiff filed an accompanying memoranda. 65 . In response the court held a status on 11/30/22 and referred the matter back to Judge Valdez for settlement. The Court now refers the portion of the pending motion [62 & 65] to Judge Valdez concerning the request to enforce the settlement Term Sheet. The Court denies plaintiff's motion for order of short order of notice 60 that requests an emergency hearing based on the Term Sheet. This request is moot at this point. Plaintiff's motion to Restore Litigation to Active Docket 61 and his motion for Attachment of Defendants' Assets and Attachment of Defendants' freely tradeable Shares 63 are taken under advisement while Judge Valdez determines whether there is an enforceable settlement. Parties should file a status report with this court by 4/3/23. Mailed notice. (dm,) (Entered: 01/10/2023)
01/11/2023	76	MINUTE entry before the Honorable Maria Valdez: This matter has been referred to this Court to issue a Report and Recommendation on Plaintiff's Motion for Contempt, Sanctions, Attorney's Fees, and to Enforce Binding Settlement Term Sheet Against Defendants 62 . Defendants' response is due 1/25/23, and Plaintiff's reply is due 2/1/23. Mailed notice (lp,) (Entered: 01/11/2023)
01/25/2023	77	RESPONSE by China Food and Beverage Company, John Does 1-100, Net Savings Link, Inc., James A Tilton, Wilton Group, Limited, Wilton UK (Group), Limited to MOTION by Plaintiff Vikram P Grover for sanctions , <i>Contempt, Attorney's Fees and to Enforce Binding Settlement Term Sheet, with Certificate of Service</i> 62 (Simmons-Gill, Catherine) (Entered: 01/25/2023)
02/01/2023	78	REPLY by Vikram P Grover to MOTION by Plaintiff Vikram P Grover for order of <i>Short Order of Notice, with Certificate of Service</i> 60 , response to motion, 77 , MOTION by Plaintiff Vikram P Grover for sanctions , <i>Contempt, Attorney's Fees and to Enforce Binding Settlement Term Sheet, with Certificate of Service</i> 62 , MOTION by Plaintiff Vikram P Grover for writ of garnishment , <i>Attachment of Defendants' Assets, and Attachment by Trustee Process of Defendant NSAV's Freely Tradeable Shares, as held by Nominee-Defendant, Pacific Stock Transfer, Inc., as T</i> 63 , memorandum in support of motion, 65 , MOTION by Plaintiff Vikram P Grover to set aside and Terminate Nisi Order and Restore Litigation to Active Docket, with Certificate of Service 61 with Certificate of Service (Giordano, Philip) (Entered: 02/01/2023)
02/23/2023	79	MINUTE entry before the Honorable Maria Valdez: The Court respectfully recommends that the District Judge deny Plaintiff's Motion for Contempt, Sanctions, Attorney's Fees, and to Enforce Binding Settlement Term Sheet Against Defendants 62 to the extent it seeks to enforce the parties' Settlement Term Sheet. In the alternative, if the District Judge finds the Settlement Term Sheet is enforceable, the Court recommends that the agreement not be found to embody a requirement that the shares at issue be electronically delivered. Counsel has fourteen days from the date of service of this Court's Report and Recommendation to file objections with the District Court. See Fed. R. Civ. P. 72(b)(2);

		28 U.S.C. § 636(b)(1). Failure to object constitutes a waiver of the right to appeal. Tumminaro v. Astrue, 671 F.3d 629, 633 (7th Cir. 2011). All matters relating to the referral of this action having been resolved, the case is returned to the assigned judge. Mailed notice (lp,) (Entered: 02/23/2023)
02/23/2023	<u>80</u>	REPORT AND RECOMMENDATION. Objections to R&R due by 3/9/2023 Signed by the Honorable Maria Valdez on 2/23/2023: Mailed notice (lp,) (Entered: 02/23/2023)
02/24/2023	<u>81</u>	MINUTE entry before the Honorable Mary M. Rowland: Telephonic status set for 3/21/23 at 9:30 AM. Parties should call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 02/24/2023)
03/21/2023	<u>82</u>	MINUTE entry before the Honorable Mary M. Rowland: Telephonic status hearing held. Counsel appeared telephonically. For the reasons stated on the record, this court adopts Judge Valdez's report and recommendation <u>80</u> . Plaintiff's motion to enforce settlement <u>62</u> is denied. The remainder of Plaintiff's motion for contempt, sanctions, and attorney's fees <u>62</u> and motion to terminate NISI order <u>61</u> and motion for attachment of defendants' assets <u>63</u> are denied without prejudice. Parties are to promptly resume discovery. Fact discovery is will close on 11/30/23. The court will not extend this deadline absent extraordinary circumstances in light of the fact that this is a 2021 case. Wilton Defendants' initial disclosures due 4/14/23. Wilton defendants to refile their motion to dismiss by 3/24/23, response due 4/14/23; reply due 5/5/23. The court will rule by mail. Telephonic status set for 5/18/23 at 9:30 AM. Parties should call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 03/21/2023)
03/22/2023	<u>83</u>	MOTION by Defendants Wilton UK (Group), Limited, Wilton Group, Limited to dismiss for lack of jurisdiction (Attachments: # <u>1</u> Affidavit T. Bassage)(Stone, Edward) (Entered: 03/22/2023)
03/22/2023	<u>84</u>	NOTICE by Wilton Group, Limited, Wilton UK (Group), Limited re MOTION by Defendants Wilton UK (Group), Limited, Wilton Group, Limited to dismiss for lack of jurisdiction <u>83</u> (Stone, Edward) (Entered: 03/22/2023)
03/28/2023	<u>85</u>	TRANSCRIPT OF PROCEEDINGS held on 03/21/2023 before the Honorable Mary M. Rowland. Telephonic Status Hearing. Order Number: 45531. Court Reporter Contact Information: Gayle A. McGuigan, CSR, RMR, CRR, Gayle_McGuigan@ilnd.uscourts.gov. IMPORTANT: The transcript may be viewed at the court's public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through the Court Reporter/Transcriber or PACER. For further information on the redaction process, see the Court's web site at www.ilnd.uscourts.gov under Quick Links select Policy Regarding the Availability of Transcripts of Court Proceedings. Redaction Request due 4/18/2023. Redacted Transcript Deadline set for 4/28/2023. Release of Transcript Restriction set for 6/26/2023. (McGuigan, Gale) (Entered: 03/28/2023)
03/29/2023	<u>86</u>	MINUTE entry before the Honorable Mary M. Rowland: The deadline of 4/3/23 for parties to file a status report <u>75</u> is stricken. Mailed notice. (dm,) (Entered: 03/29/2023)
04/12/2023	<u>87</u>	MOTION by Attorney Edward S. Stone to withdraw as attorney for Wilton Group, Limited, Wilton UK (Group), Limited. New address information: Theunis Bassage Grosvenor House, 66-67 Athol St. Isle of Man IM1 1JE (Attachments: # <u>1</u> Exhibit A - Notification of Party Contact Information)(Stone, Edward) (Entered: 04/12/2023)

04/12/2023	<u>88</u>	MOTION by Attorney Catherine Simmons-Gill to withdraw as attorney for Wilton Group, Limited, Wilton UK (Group), Limited. New address information: Wilton Group Limited and Wilton UK (Group) Limited, Grosvenor House, 66-67 Athol Street, Isle of Man, 1M1 1JE attention: Theunis Bassage (Attachments: # <u>1</u> Exhibit 1.Notification of Party Contact Information)(Simmons-Gill, Catherine) (Entered: 04/12/2023)
04/13/2023	<u>89</u>	MEMORANDUM by Vikram P Grover in Opposition to motion to withdraw as attorney, <u>87</u> , motion to withdraw as attorney, <u>88</u> and <i>Plaintiff's Objections and Statement in Response to Withdrawal Motions, with Certificate of Service</i> (Giordano, Philip) (Entered: 04/13/2023)
04/13/2023	<u>90</u>	MINUTE entry before the Honorable Mary M. Rowland: Hearing on motions to withdraw <u>87</u> <u>88</u> is set for 4/20/23 at 9:45am. The hearing will be held telephonically. Parties should call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 04/13/2023)
04/14/2023	<u>91</u>	MINUTE entry before the Honorable Mary M. Rowland: By agreement of the parties, hearing on motions to withdraw [87, 88] set for 4/20/23 is stricken and reset to 5/2/23 at 9:30am. The hearing will be held telephonically. Parties should call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 04/14/2023)
04/14/2023	<u>92</u>	MEMORANDUM by Vikram P Grover in Opposition to motion to dismiss/lack of jurisdiction <u>83</u> and in <i>Support of Cross-Motion for Limited Jurisdictional Discovery and, in the Alternative, an Evidentiary Hearing, with Exhibits A-D, and with a Certificate of Service</i> (Giordano, Philip) (Entered: 04/14/2023)
04/14/2023	<u>93</u>	MOTION by Plaintiff Vikram P Grover for discovery <i>as a Cross-Motion for Limited Jurisdictional Discovery of the Wilton Defendants, or, in the Alternative, for an Evidentiary Hearing, with a Certificate of Service</i> (Giordano, Philip) (Entered: 04/14/2023)
04/17/2023	<u>94</u>	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's cross motion for limited jurisdictional discovery, or in the alternative, for an evidentiary hearing, as to the motion to dismiss for lack of jurisdiction by the Wilton Group Defendants <u>93</u> is set for the same day as the previously-set hearing of 5/2/23 at 9:30am. Parties shall call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 04/17/2023)
04/19/2023	<u>95</u>	MOTION by Plaintiff Vikram P Grover to compel <i>Wilton Defendants to Serve Initial Disclosures and for Sanctions and Reasonable Attorney's Fees, with Certificate of Service</i> (Giordano, Philip) (Entered: 04/19/2023)
04/20/2023	<u>96</u>	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion to compel <u>95</u> is set for the same day as the previously-set hearing of 5/2/23 at 9:30am. Parties shall call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 04/20/2023)
04/24/2023	<u>97</u>	REPLY by Wilton Group, Limited, Wilton UK (Group), Limited to memorandum in opposition to motion, <u>89</u> , MOTION by Attorney Edward S. Stone to withdraw as attorney for Wilton Group, Limited, Wilton UK (Group), Limited. New address information: Theunis Bassage Grosvenor House, 66-67 Athol St. Isle of Man 1M1 1JE <u>87</u> , MOTION by Attorney Catherine Simmons-Gill to withdraw as attorney for Wilton Group, Limited, Wilton UK (Group), Limited. New address information: Wilton Group Limited and Wilton UK (Group) Limited, Grosvenor House, 66-67 Athol Street, Isle of Man, 1M <u>88</u> (Attachments: # <u>1</u> Declaration Ex. 1 Declaration of Edward S. Stone) (Simmons-Gill, Catherine) (Entered: 04/24/2023)
05/02/2023	<u>98</u>	MINUTE entry before the Honorable Mary M. Rowland: Telephonic motion hearing held. Counsel appeared telephonically. For the reasons stated on the record, Attorney Edward S. Stone and Attorney Catherine Simmons-Gill's motions for leave to withdraw as counsel

		for Wilton Group, Limited and Wilton UK (Group) Limited (Wilton defendants) [87, 88] are granted. Wilton Defendants are reminded that as a corporation they are not permitted to appear pro se in court and must be represented by counsel. The court will allow time for Wilton Defendants to retain counsel. By 7/7/23 Defendants must be represented by counsel or risk being in found in default. Wilton defendants' motion to dismiss 83 is denied without prejudice. Plaintiff's motion for discovery 93 and motion to compel 95 are also denied without prejudice. Mr. Stone is directed to send a copy of this order to Wilton defendants with copy to plaintiff's counsel. Telephonic status is continued to 7/14/23 at 8:30AM. Parties should call 866-434-5269 and the access code is 3751971. Mailed notice. (dm,) (Entered: 05/02/2023)
05/05/2023	99	MINUTE entry before the Honorable Mary M. Rowland: Telephonic status set for 5/18/23 is stricken. Mailed notice. (dm,) (Entered: 05/05/2023)
05/25/2023	100	MOTION by Attorney Edward S. Stone to withdraw as attorney for China Food and Beverage Company, Net Savings Link, Inc., James A Tilton. New address information: James Tilton, 1942 Broadway Street, Suite 314c, Boulder, CO 80302 (Attachments: # 1 Declaration Edward Stone, # 2 Exhibit Notifications of Party Contact Info)(Stone, Edward) (Entered: 05/25/2023)
05/25/2023	101	MOTION by Attorney Catherine Simmons-Gill to withdraw as attorney for China Food and Beverage Company, John Does 1-100, Net Savings Link, Inc., James A Tilton. New address information: James Tilton, c/o Net Savings Link, Inc., 1942 Broadway Street, Suite 314c, Boulder, CO 80302 (Attachments: # 1 Exhibit 1.Notification of Party Contact Information)(Simmons-Gill, Catherine) (Entered: 05/25/2023)
05/26/2023	102	MINUTE entry before the Honorable Mary M. Rowland: Hearing on motions to withdraw 100 101 is set for 6/16/23 at 9:30am. Defense counsel is to notify defendants and defendants are required to appear. Parties should call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 05/26/2023)
05/26/2023	103	RESPONSE by James A Tilton to Edward S. Stone, Esq. and Attorney Catherine Simmons-Gill, Esq. motion for leave to withdraw as counsel for Net Savings Link, Inc., China Food and Beverages Co., and James A Tilton. (jg,) (Entered: 05/26/2023)
05/26/2023	104	RESPONSE by James A Tilton to Edward S. Stone, Esq. and Attorney Catherine Simmons-Gill, Esq. motion for leave to withdraw as counsel for Net Savings Link, Inc., China Food and Beverages Co., and James A Tilton. (jg,) (Entered: 05/26/2023)
06/09/2023	105	REPLY by Defendants China Food and Beverage Company, Net Savings Link, Inc., James A Tilton to response to motion 103 , response to motion 104 (Stone, Edward) (Entered: 06/09/2023)
06/15/2023	106	RESPONSE to reply from attorney Edward S. Stone, Esq. and attorney Catherine Simmons-Gill, Esq. motion for leave to withdraw as counsel for Net Savings Link, Inc., China Food and Beverages Co., and James Tilton, by Defendant James A Tilton. (daj,) (Entered: 06/15/2023)
06/15/2023	107	RESPONSE by Plaintiff Vikram P Grover to response to motion 103 , Response, 106 , terminate deadlines,, set motion and R&R deadlines/hearings, 102 , motion to withdraw as attorney, 101 , motion to withdraw as attorney, 100 , reply 105 , response to motion 104 and <i>Certificate of Service</i> (Giordano, Philip) (Entered: 06/15/2023)
06/16/2023	108	MINUTE entry before the Honorable Mary M. Rowland: Telephonic motion hearing held. Counsel and Mr. Tilton appeared telephonically. For the reasons stated on the record,

		Attorneys Edward Stone and Catherine Simmons-Gill's motions for leave to withdraw as counsel for Net Savings Link, Inc., China Food and Beverages Co., and James A. Tilton 100 101 are granted. The court will allow time for Defendants to retain counsel. Defendant Tilton is reminded Defendants Wilton UK (Group), Limited and China Food and Beverage Company as corporate entities are not permitted to appear pro se in court and must be represented by counsel. All defendants are given until 8/17/23 to find replacement counsel. Failure by the corporate entities to find replacement counsel could result in a default judgment being entered against them. Telephonic status set for 7/14/23 is stricken and reset to 8/17/23 at 9:30am. Parties should call 866-434-5269 and the access code is 3751971. Mailed notice. (dm,) (Entered: 06/16/2023)
06/30/2023	109	NOTICE by Philip M. Giordano of Change of Address <i>with Certificate of Service</i> (Giordano, Philip) (Entered: 06/30/2023)
08/16/2023	111	MINUTE entry before the Honorable Mary M. Rowland: No party is permitted to communicate with the court via email. All such communications will be filed on the public docket. Mr. Tilton, who is has shown himself quite able to track the docket, has requested an extension of tomorrow's status hearing and an extension of time to secure counsel for corporate defendants. The court grants both requests. Status hearing set for 9/19/23 at 9:30 AM Central Time. Parties should call 866-434-5269 and the access code is 3751971. There will be no further extensions. If the corporate defendants do not have counsel, default may be entered against them. If Mr. Tilton fails to appear, default may be entered against him. The court strikes the hearing set for 8/17/23. Mailed notice. (dm,) (Entered: 08/16/2023)
08/16/2023	112	SEALED EMAIL to the court by Defendant James A Tilton. (dm,) (Entered: 08/16/2023)
09/19/2023	113	MINUTE entry before the Honorable Mary M. Rowland: Telephonic status hearing held. Plaintiff and Defendant Tilton appeared telephonically. Corporate defendants have not retained counsel and are in default in terms of responding to discovery. Mr. Tilton is permitted to proceed pro se. By close of business today, Plaintiff will send Defendant Tilton discovery previously tendered to his former counsel. Tilton is to respond to discovery by 10/3/23. The Court informed Mr. Tilton that he is allowed to serve written discovery and request documents relevant to his case. He can also take depositions but must pay for a court reporter. Fact discovery remains set to close on 11/30/23. 82 Defendants are free to retain counsel, but the court will not stay discovery any longer for that purpose. If counsel files an appearance on behalf of any defendant, the court will set a status. Otherwise, parties should file a joint status report on the status of discovery and proposing a briefing schedule on Plaintiff's motion for summary judgment by 12/5/23. Mailed notice. (dm,) (Entered: 09/19/2023)
09/21/2023	114	MOTION by Plaintiff Vikram P Grover for entry of default <i>under Rule 55(a) against Wilton UK, with Certificate of Service</i> (Attachments: # 1 Affidavit of Philip M. Giordano, with Exhibit A)(Giordano, Philip) (Entered: 09/21/2023)
09/21/2023	115	MOTION by Plaintiff Vikram P Grover for entry of default <i>under Rule 55(a) against Wilton Isle of Man, with Certificate of Service</i> (Attachments: # 1 Affidavit of Philip M. Giordano, with Exhibits A and B)(Giordano, Philip) (Entered: 09/21/2023)
09/21/2023	116	MOTION by Plaintiff Vikram P Grover for entry of default <i>under Rule 55(a) against Chiina Food and Beverage Co., with Certificate of Service</i>

		(Attachments: # 1 Affidavit of Philip M. Giordano, with Exhibits A - D)(Giordano, Philip) (Entered: 09/21/2023)
09/21/2023	117	MOTION by Plaintiff Vikram P Grover for entry of default <i>under Rule 55(a) against Net Savings Link, Inc., with Certificate of Service</i> (Attachments: # 1 Affidavit of Philip M. Giordano, with Exhibits A - D)(Giordano, Philip) (Entered: 09/21/2023)
09/26/2023	118	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motions for default against Wilton UK and Wilton Isle of Man [114 and 115] are granted. Defaults pursuant to FRCP 55(a) are entered against Wilton UK and Wilton Isle of Man. Neither defendant has responded to the complaint despite being served in December 2021. Further, both defendants have been without counsel since June of 2023. The court will vacate default against a defendant if that defendant cures these defects within 14 days. Motion for default judgment due by 10/30/23. Mailed notice. (dm,) (Entered: 09/26/2023)
09/26/2023	119	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motions for default against Net Savings Link, Inc and China Food and Beverage, Co. [116 and 117] are granted. Defaults pursuant to FRCP 55(a) are entered against Net Savings Link, Inc and China Food and Beverage, Co. Although these defendants filed an answer to the complaint in February 2022 36 , neither defendant has responded to the discovery that was served in June of 2023. Further, both defendants have been without counsel since June of 2023. The court will vacate default against a defendant if that defendant cures these defects within 14 days. Motion for default judgment due by 10/30/23. Mailed notice. (dm,) (Entered: 09/26/2023)
10/05/2023	120	MOTION by Plaintiff Vikram P Grover for entry of default <i>pursuant to Rule 55(a), with Certificate of Service</i> (Attachments: # 1 Affidavit of Philip M. Giordano, together with Exhibits A - F) (Giordano, Philip) (Entered: 10/05/2023)
10/05/2023	121	MOTION by Plaintiff Vikram P Grover to compel , <i>in the Alternative, Discovery, for Sanctions and Reasonable Attorney's Fees and Costs, with Certificate of Service</i> (Attachments: # 1 Affidavit of Philip M. Giordano, with Exhibits A-F)(Giordano, Philip) (Entered: 10/05/2023)
10/06/2023	122	RESPONSE to Request for Discovery Documents from James Arthur Tilton. (lw,) (Entered: 10/09/2023)
10/10/2023	124	RESPONSE by Defendant James A Tilton to Plaintiff's renewed request for entry of default pursuant to Rule 55(a) against Defendant James A. Tilton and to compel, in the alternative, discovery from Defendant James A. Tilton and for sanctions and reasonable Attorney's fees and costs (jn,) (Entered: 10/12/2023)
10/11/2023	123	REPLY by Plaintiff Vikram P Grover to response to discovery 122 , motion to compel, 121 , motion for entry of default 120 and <i>Reply Memorandum and Opposition to Defendant James Tilton's Requests for Extension of Time, with Certificate of Service</i> (Attachments: # 1 Affidavit of Philip M. Giordano, Esq. with Exhibit A)(Giordano, Philip) (Entered: 10/11/2023)
10/13/2023	125	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion for default pursuant to Rule 55(a) is taken under advisement. Plaintiff is to file a status report by 10/25/23 updating the Court on discovery. Mailed notice. (dm,) (Entered: 10/13/2023)

10/13/2023	<u>126</u>	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion to compel <u>121</u> is granted as follows: Discovery was served on Defendant on June 15, 2003. The discovery consisted for first set of interrogatories; first set of requests for documents; first set of requests for admissions; and a notice to depose Mr. Tilton. The discovery was served on defense counsel. On June 6, 2023, the Court allowed defense counsel to withdraw from representing Tilton. <u>108</u> Tilton missed the August court date with little notice to the court. [110-112]. At the status on September 19, 2023, the Court ordered Plaintiff's counsel to produce discovery requests to Plaintiff that day and ordered Tilton to respond by October 3, 2023. <u>113</u> Tilton disregarded this deadline and did not request an extension from the Court. Instead, in response to Plaintiff's motions for default <u>120</u> and motion to compel <u>121</u> , Tilton states that :the "[r]espectfully and regretfully, the two weeks allotted by the court to produce said discovery documents was not enough time". Plaintiff's motion to compel is granted as follows: First, Tilton is to provide response to interrogatories without objections (those are waived) by 10/17/23. All requests to admit are deemed admitted. Tilton requested more time to produce documents and the Court grants that request until 10/20/23 to produce those documents. No further extension. Plaintiff is awarded \$2,000 in fees for the fees and costs associated with bringing this motion. Mailed notice. (dm,) (Entered: 10/13/2023)
10/13/2023	<u>127</u>	RESPONSE TO PLAINTIFF'S REPLY AND OPPOSITION TO DEFENDANT JAMES TILTON'S REQUEST FOR ADDITIONAL TIME TO RESPOND TO DISCOVERY by Defendant James A Tilton. (ph,) (Entered: 10/13/2023)
10/16/2023	<u>128</u>	MOTION by Plaintiff Vikram P Grover to clarify <i>and Correct Minute Entry Pursuant to Rule 60(a) of Federal Rules of Civil Procedure, with Certificate of Service</i> (Giordano, Philip) (Entered: 10/16/2023)
10/16/2023	<u>129</u>	RESPONSE by Defendant James A Tilton to minute entry before the Honorable Mary M. Rowland of October 13, 2023, document number 126. (jn,) (Entered: 10/17/2023)
10/17/2023	<u>130</u>	RESPONSE by Defendant James A Tilton to Plaintiff Vikram P. Grover's first set of interrogatories to Defendant's Net Savings Link, Inc., China Food and Beverage Co., and James A. Tilton. (jn,) (Entered: 10/18/2023)
10/18/2023	<u>131</u>	MINUTE entry before the Honorable Mary M. Rowland: Defendant Tilton has filed a "Response" to the Court's minute entry of October 13, 2023. <u>129</u> Tilton's filing is a request for more time to respond to discovery. Much of the request contains irrelevant information about Tilton's previous counsel. In the Court 10/13/23 Order the Court noted that Tilton received the discovery requests on 9/19/23 and was ordered to respond to them by 10/3/23. <u>126</u> Tilton failed to comply by that date and, instead in response to a motion for default, requested more time. The Court extended the time to respond to document requests to 10/20/23. Tilton now argues that the time the Court allotted (he describes it as 22 days) is not enough time, and he believes the "standard amount of time would normally be 90 days, which would be on or about December 19, 2023." <u>127</u> at 3. Federal Rule of Civil Procedure 34 provides that a party to whom a request for documents production is directed "must respond within 30 days after being served a shorter or longer time may be ordered by the Court." Tomorrow, 10/19/23, is thirty days since Tilton was served the document requests. Moreover, the case has been pending for two years with little progress. The Court is well within its discretion to manage discovery. Tilton is given until 10/30/23 to respond to the document requests. No extension is granted (if on is being requested) to respond to the interrogatories or the requests for admissions. There will be no further extensions. Mailed notice. (dm,) (Entered: 10/18/2023)
10/18/2023	<u>132</u>	MINUTE entry before the Honorable Mary M. Rowland: Defendant Tilton is reminded not to file discovery responses <u>130</u> or discovery documents on the docket unless they are

		attached to and in support of a pleading. Mailed notice. (dm,) (Entered: 10/18/2023)
10/18/2023	133	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion to correct clerical mistakes 128 is granted. The Order entered on October 13, 2023 126 is corrected to reflect that discovery was served on Plaintiff on June 15, 2023-not June 15, 2003. The Order is further corrected to reflect that Mr. Tilton's counsel was permitted to withdraw on June 16, 2023 not on June 6, 2023. 108 Mailed notice. (dm,) (Entered: 10/18/2023)
10/25/2023	134	MOTION by Plaintiff Vikram P Grover for leave to file excess pages <i>in his Memorandum of Law for Plaintiff's Rule 55(b) Motion for Default Judgment Against Corporate Defendants, together with a Certificate of Service</i> (Giordano, Philip) (Entered: 10/25/2023)
10/26/2023	135	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion to file excess pages 134 is granted. Plaintiff is granted leave to file brief of up to 25 pages. Mailed notice. (dm,) (Entered: 10/26/2023)
10/30/2023	136	MOTION by Plaintiff Vikram P Grover for default judgment as to <i>Corporate Defendants Only, Net Savings Link, Inc., China Food and Beverage Co, Wilton Group, Limited, and Wilton UK (Group), Limited, with a Certificate of Service</i> (Attachments: # 1 Affidavit of Vikram Grover, # 2 Affidavit of pHilip M. Giordano, with Exhibits A-F, # 3 Text of Proposed Order of Plaintiff Vikram Grover)(Giordano, Philip) (Entered: 10/30/2023)
10/30/2023	137	MEMORANDUM by Vikram P Grover in support of motion for default judgment, 136 <i>as to Corporate Defendants Only, Net Savings Link, Inc., China Food and Beverage Co., Wilton Group, Limited andWilton UK (Group), Limited, with a Cedrtificate of Service</i> (Giordano, Philip) (Entered: 10/30/2023)
10/31/2023	138	MINUTE entry before the Honorable Mary M. Rowland: Hearing on Plaintiff's motion for default judgment 136 is set for 11/14/23 at 9:45am. Parties should call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 10/31/2023)
11/06/2023	139	MOTION by Plaintiff Vikram P Grover to continue <i>November 14th Hearing on Rule 55(b) Motion for Default Judgment Against Corporate Defendants, with a Certificate of Service</i> (Giordano, Philip) (Entered: 11/06/2023)
11/07/2023	140	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion for continuance of November 14th hearing to his motion for entry of rule 55(b) default judgments against corporate defendants 139 is granted. Hearing on Plaintiff's motion for default judgment 136 set for 11/14/23 is stricken and reset to 11/15/23 at 9:45am. Parties should call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 11/07/2023)
11/07/2023	141	RESPONSE by Plaintiff Vikram P Grover to Plaintiff Vikram P. Grover's motion for continuance of November 14th hearing as to his motion for entry of Rule 55(b) default judgments against corporate Defendants (jn,) (Entered: 11/07/2023)
11/08/2023	142	MINUTE entry before the Honorable Mary M. Rowland: The individual defendant, Tilton, has requested that the hearing on the motion for default as to the corporate defendants be reset. Mr. Tilton has no right to appear on behalf of the corporate defendants as he is not an attorney. Nevertheless, the court will reset the hearing for 12/5/23 at 9:30 AM. This hearing will not be reset. Parties should call 866-434-5269; access code 3751971. Mailed notice. (dm,) (Entered: 11/08/2023)

12/04/2023	<u>143</u>	MOTION by Plaintiff Vikram P Grover for leave to file <i>[Proposed] Supplemental Memorandum as to Damages Calculations as to Default Judgment Motion Against Corporate Defendants, with Certificate of Service</i> (Giordano, Philip) (Entered: 12/04/2023)
12/05/2023	<u>144</u>	STATUS Report , <i>filed, Filed Jointly, with a Certificate of Service</i> by Vikram P Grover (Giordano, Philip) (Entered: 12/05/2023)
12/05/2023	<u>145</u>	STATUS Report <i>Amended Fifth Report, with Defendant James Tilton's comments, with a Certificate of Service</i> , by Vikram P Grover (Giordano, Philip) (Entered: 12/05/2023)
12/05/2023	<u>146</u>	MINUTE entry before the Honorable Mary M. Rowland: Telephonic motion hearing held. Counsel for Plaintiff and defendant Tilton appeared telephonically. No counsel appeared on behalf of the corporate defendants. For the reasons stated on the record, Plaintiff's motions for default judgment against corporate defendants Net Savings Link, Inc., Wilton Group, Limited, Wilton UK (Group), LTD, Wilton Group, Limited, and China Food and Beverage Co. <u>136</u> and motion for default pursuant to FRCP 55(a) <u>120</u> are granted. The corporate entities have been unrepresented since 6/16/23 and have largely failed to participate in discovery during the entire time the case has been pending. Plaintiff's motion is granted. Default Judgment against corporate defendants Net Savings Link, Inc., Wilton Group, Limited, Wilton UK (Group), LTD, Wilton Group, Limited, and China Food and Beverage Co. is entered in the amount of \$57,903,750.00 including post judgment interest. The court will allow Plaintiff to seek reasonable attorneys' fees. Plaintiff's motion for attorneys' fees is due 1/9/24. Plaintiff's motion to file a supplement in support of his damage's calculation <u>143</u> is granted. The court has reviewed the amended joint status report. <u>145</u> The parties reported on the status of discovery. The court adopts the proposed briefing schedule of Plaintiffs' motion for summary judgment as follows: Plaintiff's motion for summary judgment due 1/31/24; Defendant Tilton's response due 2/21/24. Plaintiff's reply due 2/28/24. These dates will NOT be extended. The court will either set the matter for hearing or rule by mail. Mailed notice. (dm,) (Entered: 12/05/2023)
12/28/2023	<u>147</u>	ANNUAL REMINDER: Pursuant to <u>Local Rule 3.2 (Notification of Affiliates)</u> , any nongovernmental party, other than an individual or sole proprietorship, must file a statement identifying all its affiliates known to the party after diligent review or, if the party has identified no affiliates, then a statement reflecting that fact must be filed. An affiliate is defined as follows: any entity or individual owning, directly or indirectly (through ownership of one or more other entities), 5% or more of a party. The statement is to be electronically filed as a PDF in conjunction with entering the affiliates in CM/ECF as prompted. As a reminder to counsel, parties must supplement their statements of affiliates within thirty (30) days of any change in the information previously reported. This minute order is being issued to all counsel of record to remind counsel of their obligation to provide updated information as to additional affiliates if such updating is necessary. If counsel has any questions regarding this process, this <u>LINK</u> will provide additional information. Signed by the Executive Committee on 12/28/2023: Mailed notice. (tg,) (Entered: 12/28/2023)
01/09/2024	<u>148</u>	MOTION by Plaintiff Vikram P Grover for attorney fees <i>and costs against Corporate Defendants, with Certificate of Service</i> (Attachments: # <u>1</u> Affidavit of Philip M. Giordano, Esq., with Exhibits 1 - 4)(Giordano, Philip) (Entered: 01/09/2024)

01/10/2024	<u>149</u>	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff has filed a motion for fees against the corporate defendants who are not represented. Because the defendants are not represented, the court will not set a briefing schedule. The court will review the request for reasonableness. Summary judgment briefing remains set. Mailed notice. (dm,) (Entered: 01/10/2024)
01/29/2024	<u>150</u>	MOTION by Plaintiff Vikram P Grover for leave to file excess pages <i>as to Plaintiff's anticipated Summary Judgment Motion, with a Certificate of Service</i> (Giordano, Philip) (Entered: 01/29/2024)
01/31/2024	<u>151</u>	MINUTE entry before the Honorable Mary M. Rowland: The Court has reviewed Plaintiff's motion for leave to file excess pages as to Plaintiff's anticipated Summary Judgment motion <u>150</u> . The Court grants Plaintiff's motion. Plaintiff's motion shall not exceed 40 pages. Mailed notice. (dm,) (Entered: 01/31/2024)
01/31/2024	<u>152</u>	MOTION by Plaintiff Vikram P Grover for summary judgment , <i>with Certificate of Service</i> (Attachments: # <u>1</u> Supplement R56.1 Material Facts Statement, # <u>2</u> Affidavit of Vikram P. Grover, # <u>3</u> Affidavit of Philip M. Giordano, Esq., with Exhibits 1 - 18 attached thereto., # <u>4</u> Text of Proposed Order Plaintiff's [Proposed] Order on Motion for Summary Judgment) (Giordano, Philip) (Entered: 01/31/2024)
01/31/2024	<u>153</u>	MOTION by Plaintiff Vikram P GroverRule 56 Motion for Summary Judgment Memorandum against Defendant James Tilton , <i>with Certificate of Service</i> (Giordano, Philip) (Entered: 01/31/2024)
02/21/2024	<u>154</u>	RESPONSE by Defendant James A Tilton to Plaintiff Vikram Grover's Rule 56 motion for summary judgment against Defendant James Tilton only. (jn,) (Entered: 02/22/2024)
02/27/2024	<u>155</u>	RESPONSE by James A Tilton to MOTION by Plaintiff Vikram P Grover for summary judgment , <i>with Certificate of Service</i> <u>152</u> , MOTION by Plaintiff Vikram P GroverRule 56 Motion for Summary Judgment Memorandum against Defendant James Tilton , <i>with Certificate of Service</i> <u>153</u> (nsf,) (Entered: 02/27/2024)
02/28/2024	<u>156</u>	REPLY by Vikram P Grover to Response <u>154</u> , MOTION by Plaintiff Vikram P Grover for summary judgment , <i>with Certificate of Service</i> <u>152</u> , MOTION by Plaintiff Vikram P GroverRule 56 Motion for Summary Judgment Memorandum against Defendant James Tilton , <i>with Certificate of Service</i> <u>153</u> , response to motion, <u>155</u> and to Strike, <i>with Certificate of Service</i> (Giordano, Philip) (Entered: 02/28/2024)
03/13/2024	<u>157</u>	RESPONSE by Defendant James A Tilton to plaintiff Vikram Grover's reply Memorandum of Law in support of his motion for summary judgment for damages and equitable relief against defendant James A. Tilton only. (aee,) (Entered: 03/13/2024)
04/02/2024	<u>158</u>	MOTION by Plaintiff Vikram P Grover to strike Response <u>157</u> <i>with Certificate of Service</i> (Attachments: # <u>1</u> Affidavit of Philip M. Giordano, Esq., with Exhibit A)(Giordano, Philip) (Entered: 04/02/2024)

04/04/2024	<u>159</u>	RESPONSE by Defendants China Food and Beverage Company, Net Savings Link, Inc., James A Tilton to Plaintiff Vikram Grover's motion to strike defendant James Tilton's Additional Response to plaintiff's reply memorandum in support of his motion for summary judgment and for sanctions and attorney's fees (Received via pro se email on 04/4/2024.)(rp,) (Entered: 04/04/2024)
05/05/2024	<u>160</u>	MOTION by Plaintiff Vikram P Grover for order <i>Awarding Prejudgment Interest Against Corporate Defendants, with Certificate of Service</i> (Giordano, Philip) (Entered: 05/05/2024)
06/21/2024	<u>161</u>	MOTION by Plaintiff Vikram P Grover for hearing <i>on Emergency Basis and on a Short Order of Notice, with a Certificate of Service</i> (Giordano, Philip) (Entered: 06/21/2024)
06/21/2024	<u>162</u>	MOTION by Plaintiff Vikram P Grover for preliminary injunction <i>Temporary Restraining Order and Grover and Giordano Affidavits, with Exhibits A-N, with Certificate of Service</i> (Attachments: # <u>1</u> Supplement Plaintiff's Memorandum, # <u>2</u> Affidavit of Plaintiff Vikram P. Grover, # <u>3</u> Affidavit of Philip M. Giordano, Esq. with Exhibits A-N, # <u>4</u> Text of Proposed Order Plaintiff's [Proposed] Order)(Giordano, Philip) (Entered: 06/21/2024)
06/21/2024	<u>163</u>	MOTION by Plaintiff Vikram P Grover for writ of garnishment , <i>Attachment and Attachment by Trustee Process, Memorandum and [Proposed] Attachment Order, with Certificate of Service</i> (Attachments: # <u>1</u> Supplement Plaintiff's Attachment Memorandum, # <u>2</u> Text of Proposed Order Plaintiff's [Proposed] Attachment Order)(Giordano, Philip) (Entered: 06/21/2024)
06/24/2024	<u>164</u>	MINUTE entry before the Honorable Mary M. Rowland: Motion for hearing <u>161</u> is granted. Telephonic hearing on Plaintiff's motion for TRO <u>162</u> and on Plaintiff's motion for writ of garnishment <u>163</u> set for 6/26/24 at 3:00 PM Central Time. Parties are directed to call 1-866-434-5269, access code 3751971#. Corporate defendants are reminded they may only appear through counsel. Mailed notice (ags) (Entered: 06/24/2024)
06/26/2024	<u>165</u>	MOTION by Plaintiff Vikram P Grover to strike <i>Tilton Letter</i> (Giordano, Philip) (Entered: 06/26/2024)
06/26/2024	<u>166</u>	MINUTE entry before the Honorable Mary M. Rowland: Telephonic motion hearing held. Plaintiff and Mr. Tilton appeared telephonically. Corporate entities are not represented by counsel. Mr. Tilton is reminded he cannot represent the corporate entities. Plaintiff's emergency motion for preliminary injunction <u>162</u> and emergency motion for attachment and attachment by trustee process <u>163</u> were filed against the corporate defendants and not Mr. Tilton as an individual. Because the corporate entities remain unrepresented, Plaintiff's motions are granted. Plaintiff is to send proposed orders to the court's proposed order mailbox for entry. Mailed notice. (dm,) (Entered: 06/26/2024)
06/26/2024	<u>167</u>	ORDER ON PLAINTIFF VIKRAM P. GROVER'S EMERGENCY MOTION FOR ATTACHMENT AND ATTACHMENT BY TRUSTEE PROCESS AGAINST THE DEFENDANTS AND DEFENDANT-AGENTS Signed by the Honorable Mary M. Rowland on 6/26/2024. Mailed notice. (dm,) (Entered: 06/27/2024)
06/26/2024	<u>168</u>	ORDER ON PLAINTIFF VIKRAM P. GROVER'S EMERGENCY MOTION FOR TEMPORARY, PRELIMINARY AND PERMANENT EQUITABLE AND INJUNCTIVE RELIEF AND SPECIFIC PERFORMANCE AS AGAINST

		DEFENDANT AND DEFENDANT-AGENTS Signed by the Honorable Mary M. Rowland on 6/26/2024. Mailed notice. (dm,) (Entered: 06/27/2024)
06/26/2024	169	RESPONSE to Plaintiff Vikram Grover's Emergency Motion for temporary, preliminary and/or permanent, equitable and injunctive relief and specific performance against Defendants and Defendant-Agents filed by Defendant James A. Tilton. (Received via pro se email on 6/26/2024) (jh,) (Entered: 06/27/2024)
06/27/2024	170	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion to strike 165 Mr. Tilton's letter 169 is granted. Tilton continues to try to represent the corporate defendants that are in default as they are not represented by counsel. The letter is inappropriately filed. Mailed notice. (dm,) (Entered: 06/27/2024)
06/27/2024	171	RESPONSE to Plaintiff Vikram Grover's emergency motion for attachment and attachment by trustee process against the Defendants and Defendant agents filed by Defendant James A Tilton. (Received via pro se email on 06/27/2024.) (daj,) (Entered: 06/27/2024)
06/28/2024	172	MOTION by Defendant James A Tilton to vacate attachment order against defendant James A. Tilton only. (Received via pro se email on 6/28/24). (jj,) (Entered: 06/28/2024)
07/03/2024	173	MOTION by Plaintiff Vikram P Grover for hearing re order on motion to strike,, text entry, 170 , Response 171 , Response, 169 , order 167 , order on motion for preliminary injunction,,, order on ootion for writ of garnishment,,, terminate deadlines,,, terminate hearings,,, terminate motion and R&R deadlines/hearings,,, motion hearing,, 166 , order, 168 and <i>Certificate of Service</i> (Giordano, Philip) (Entered: 07/03/2024)
07/03/2024	174	MOTION by Plaintiff Vikram P Grover for judgment , <i>Emergency Basis and Short Order, and for Entry of Final Judgment Against Corporate Defendants, with Exhibit A and Certificate of Service attached</i> (Giordano, Philip) (Entered: 07/03/2024)
07/09/2024	175	MINUTE entry before the Honorable Mary M. Rowland: The Court has reviewed Defendant Tilton's motion to vacate attachment order against Defendant Tilton only 172 . The Court notes that Defendant Tilton has not had a judgment against him and Plaintiff's motion for summary judgment against Defendant Tilton 153 is still pending before the Court. Plaintiff is to file a response to Defendant Tilton's motion 172 , no more than 5 pages, by 7/15/24. Mailed notice. (dm,) (Entered: 07/09/2024)
07/12/2024	176	MOTION by Plaintiff Vikram P Grover for hearing <i>on Emergency Basis and on a Short Order of Notice, with a Certificate of Service</i> (Giordano, Philip) (Entered: 07/12/2024)
07/12/2024	177	MOTION by Plaintiff Vikram P Grover to appoint receiver <i>John Busacca as Chief Restructuring Officer (CRO) of Net Savings Link, Inc. (NSAV) with Exhibits and with a Certificate of Service</i> (Attachments: # 1 Supplement Plaintiff's Memorandum, # 2 Text of Proposed Order Plaintiff's [Proposed] CRO Order)(Giordano, Philip) (Entered: 07/12/2024)
07/15/2024	178	MEMORANDUM by Vikram P Grover in Opposition to motion to vacate 172 of <i>Defendant James Tilton, with Affidavit of Philip M. Giordano, with Exhibit A thereto, and</i>

		<i>a Certificate of Service</i> (Attachments: # 1 Affidavit of Philip M. Giordano, Esq., with Exhibit A)(Giordano, Philip) (Entered: 07/15/2024)
07/15/2024	179	MINUTE entry before the Honorable Mary M. Rowland: The Court takes Plaintiff's motions 176 and 177 for an emergency hearing and to appoint receiver John Busacca under advisement. Mailed notice. (dm,) (Entered: 07/15/2024)
07/18/2024	180	MOTION by Plaintiff Vikram P Grover for leave to file , <i>on an Emergency Basis, his [Proposed] Supplemental Memorandum, with Exhibits 1-9, in Further Support of John Busacca CRO Motion and in Further Opposition to Tilton Motion to Vacate, with Certificate of Service</i> (Giordano, Philip) (Entered: 07/18/2024)
07/18/2024	182	RESPONSE by James A Tilton to Plaintiff Vikram P. Grover's opposition to Defendant James A. Tilton's motion to vacate attachment order against Defendant James A. Tilton only. (Received via pro se email on 7/18/2024). (jn,) (Entered: 07/22/2024)
07/22/2024	181	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion for leave to file a Supplemental Memorandum with Exhibits 180 is granted. Plaintiff should file the Supplemental Memorandum as a separate docket entry. Plaintiff's motion for emergency hearing 180 is under advisement. Mailed notice. (dm,) (Entered: 07/22/2024)
07/22/2024	185	RESPONSE by James A Tilton to Plaintiff Vikram P. Grover's Emergency Motion to File [Proposed] Supplemental Memorandum in Support of his Emergency Motion to Appoint John Busacca as Chief Restructuring Office (CRO) and as Further Opposition to Defendant Tilton's Motion to Vacate Attachment Order Against Defendant James A. Tilton Only. (Received via Box.com on 07/22/2024).(lw,) (Entered: 07/24/2024)
07/24/2024	183	MEMORANDUM by Vikram P Grover in support of motion to vacate 172 , motion for hearing 176 , motion for hearing, 173 , motion for judgment 174 , motion to appoint receiver, 177 with Leave Granted on July 22, 2024, with a Certificate of Service (Giordano, Philip) (Entered: 07/24/2024)
07/24/2024	184	MOTION by Plaintiff Vikram P Grover for leave to file <i>attached Exhibit A, a [Proposed] Further Supplemental Memorandum, with Exhibits 1-3, in Support of Plaintiff's Emergency Motion to Appoint John Busacca as Chief Restructuring Officer (CRO) of Defendant Net Savings Link, Inc. (NSAV) and in Further Opposition to Defendant Tilton's Motion to Vacate, with Certificate of Service</i> (Giordano, Philip) (Entered: 07/24/2024)
07/26/2024	186	ADDITIONAL RESPONSE by Defendant James A Tilton To Plaintiff Vikram P. Grover's Emergency Motion To File [Proposed] Supplemental Memorandum In Support Of His Emergency Motion To Appoint John Busacca As Chief Restructuring Officer (CRO) And As Further Opposition To Defendant Tilton's Motion To Vacate Attachment Order Against Defendant James A. Tilton Only (Received via pro se email on 7/26/24) (axk,) (Entered: 07/26/2024)
07/30/2024	187	NOTICE by Vikram P Grover re memorandum in support of motion, 183 , memorandum in opposition to motion, 178 , order on motion for hearing, order on motion to appoint receiver, text entry 179 , MOTION by Plaintiff Vikram P Grover to appoint receiver <i>John Busacca as Chief Restructuring Officer (CRO) of Net Savings Link, Inc. (NSAV) with Exhibits and with a Certificate of Service</i> 177 Plaintiff's Notice of Request for Hearing, with Certificate of Service (Giordano, Philip) (Entered: 07/30/2024)

08/02/2024	<u>188</u>	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion for leave to file supplemental memorandum <u>184</u> is granted. Plaintiff should file the supplemental memorandum as a separate docket entry. Hearing on Plaintiff's motion for appointment of John Busacca as CRO for NSAV <u>177</u> set for 8/8/24 at 1:30 p.m. on Webex. Counsel will receive an email with a link to join the video conference prior to the hearing. Members of the public and media will be able to call in to listen to this hearing. The call-in number is 650-479-3207 and the call-in ID is 1801732451. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. Violation of these prohibitions may result in sanctions, including removal of court issued media credentials, restricted entry to future hearings, denial of entry to future hearings, or any other sanctions deemed necessary by the Court. Mailed notice. (dm,) (Entered: 08/02/2024)
08/06/2024	<u>189</u>	MOTION by Defendant Net Savings Link, Inc. for leave to appear as Local Counsel pursuant to LR 83.15 (Fitter, Jawad) (Entered: 08/06/2024)
08/06/2024	<u>190</u>	MOTION by Defendant Net Savings Link, Inc. to continue 8/8/24 <i>Hearing on Plaintiff's Motion appointment of John Busacca as CRO for NSAV for 30 days</i> (Fitter, Jawad) (Entered: 08/06/2024)
08/06/2024	<u>191</u>	ATTORNEY Appearance for Intervenor WFD CAPITAL LLC by Andrew Roman Perrong (Perrong, Andrew) (Entered: 08/06/2024)
08/06/2024	<u>192</u>	MINUTE entry before the Honorable Mary M. Rowland: MOTION by Defendant Net Savings Link, Inc. for leave to appear as Local Counsel pursuant to LR 83.15 <u>189</u> is granted. MOTION by Defendant Net Savings Link, Inc. to continue 8/8/24 Hearing on Plaintiff's Motion appointment of John Busacca as CRO for NSAV for 30 days <u>190</u> is denied. The court will conduct a status hearing on 8/8/24 at 1:30 PM Central Time. Local Counsel for Net Savings Link is required to attend. Counsel for Intervenor WFD capital <u>191</u> is welcome to attend. Counsel will receive an email with a link to join the video conference prior to the hearing. Members of the public and media will be able to call in to listen to this hearing. The call-in number is 650-479-3207 and the call-in ID is 1801732451. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. Violation of these prohibitions may result in sanctions, including removal of court issued media credentials, restricted entry to future hearings, denial of entry to future hearings, or any other sanctions deemed necessary by the Court. Mailed notice. (dm,) (Entered: 08/06/2024)
08/08/2024	<u>193</u>	MINUTE entry before the Honorable Mary M. Rowland: Hearing held on 8/8/24 on Webex. Plaintiff, counsel for Plaintiff, counsel for Defendant NSAV, and counsel for proposed intervenor WFD Capital LLC appeared via Webex. Defendant Tilton appeared telephonically. Counsel for Defendant NSAV stated he is working to obtain lead counsel. Counsel for Defendant NSAV shall obtain lead counsel by 8/15/24. WFD Capital LLC shall file any motion to intervene by 8/22/24. Defendant NSAV was admonished that it must IMMEDIATELY comply with the Court's prior orders dated 6/26/24 <u>167</u> <u>168</u> . By 8/14/24 at 4:00 CST, Defendant NSAV shall file a status report updating the Court on its compliance with the prior orders. Specifically, NSAV must "identify and describe, in complete detail, with all relevant information, writing and under oath, by an authorized officer of each such Defendant and Enjoined Defendant, the custodian, location amount, and all complete details, data and information, as to any and all shares of common stock and/or other classes of stock of each Defendant and Enjoined Defendant, as held from September 23, 2021 to the date of the Order, and deliver any and all documentation

		regarding, relating or supporting the same, by Defendant NSAV and as certified, under oath and by the pains and penalties of perjury, by the Chief Executive Officer of Defendant NSAV" and "identify and describe, in complete detail, with all relevant information, writing and under oath, by an authorized officer of each such Defendant and Enjoined Defendant, the custodian, location amount, and all complete details, data and information, as to any and all assets, monies, credits, rights, contracts and/or things, tangible and/or intangible, that have been removed, sold, encumbered, hypothecated, conveyed, transferred, assigned and/or moved, directly or indirectly, from the Defendants and the Defendant-Agents since the commencement of this litigation" 168 at 4. Defendant Tilton's motion to vacate 172 is denied for the reasons stated at the hearing. Defendant Tilton was advised that he is covered by the Court's orders 167 168 as an officer of the Corporate Defendants, but not in his personal capacity. Mailed notice. (dm,) (Entered: 08/09/2024)
08/08/2024	194	MINUTE entry before the Honorable Mary M. Rowland: By 8/9/24, Plaintiff shall file on the docket a short status report indicating whether he complied with Local Rule 56.2 when filing his motion for summary judgment 152 . Mailed notice. (dm,) (Entered: 08/09/2024)
08/08/2024	195	MINUTE entry before the Honorable Mary M. Rowland: (Recreation of Dkt. 194 due to system error.) By 8/9/24, Plaintiff shall file on the docket a short status report indicating whether he complied with Local Rule 56.2 when filing his motion for summary judgment 152 . Mailed notice. (dm,) (Entered: 08/09/2024)
08/08/2024	196	MINUTE entry before the Honorable Mary M. Rowland: (Recreation of Dkt. 195 due to system error.) By 8/9/24, Plaintiff shall file on the docket a short status report indicating whether he complied with Local Rule 56.2 when filing his motion for summary judgment 152 . Mailed notice. (dm,) (Entered: 08/09/2024)
08/08/2024	197	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion for prejudgment interest 160 is granted. Plaintiff's motion for entry of final judgment 174 is granted in part against the Corporate Defendants except for Defendants NSAV. Enter judgment. Mailed notice. (dm,) (Entered: 08/09/2024)
08/08/2024	198	MINUTE entry before the Honorable Mary M. Rowland: Plaintiff's motion to appoint chief restructuring officer 177 is taken under advisement. Status hearing set for 8/16/24 at 10:00 a.m. on Webex. Counsel will receive an email with a link to join the video conference prior to the hearing. Members of the public and media will be able to call in to listen to this hearing. The call-in number is 650-479-3207 and the call-in ID is 1801732451. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. Violation of these prohibitions may result in sanctions, including removal of court issued media credentials, restricted entry to future hearings, denial of entry to future hearings, or any other sanctions deemed necessary by the Court. Mailed notice. (dm,) (Entered: 08/09/2024)
08/09/2024	199	STATUS Report by Plaintiff Vikram P. Grover, with Exhibits A-D, as to Compliance with LR 56.2 for Unrepresented Defendant James Tilton and for Pending Rule 56 Summary Judgment Motion, with Certificate of Compliance with Local Rules and Certificate of Service by Vikram P Grover (Giordano, Philip) (Entered: 08/09/2024)
08/12/2024	200	MINUTE entry before the Honorable Mary M. Rowland: The Court has reviewed Plaintiff's status report 199 . In light of the fact that pro se defendant Tilton received LR 56.2 Notice on 8/9/24, the Court will allow Tilton to file a supplement to his summary

judgment briefing, that already includes a sur-reply [154, 155 and 157] by 8/16/24.
Mailed notice. (dm,) (Entered: 08/12/2024)

PACER Service Center			
Transaction Receipt			
08/14/2024 18:08:43			
PACER Login:	giochamp	Client Code:	Grover
Description:	Docket Report	Search Criteria:	1:21-cv-05054
Billable Pages:	23	Cost:	2.30

Exhibit “B”

**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF NextGen 1.7.1.1
Eastern Division**

Vikram P Grover

Plaintiff,

v.

Case No.: 1:21-cv-05054

Honorable Mary M. Rowland

Net Savings Link, Inc., et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Thursday, August 8, 2024:

MINUTE entry before the Honorable Mary M. Rowland: Hearing held on 8/8/24 on Webex. Plaintiff, counsel for Plaintiff, counsel for Defendant NSAV, and counsel for proposed intervenor WFD Capital LLC appeared via Webex. Defendant Tilton appeared telephonically. Counsel for Defendant NSAV stated he is working to obtain lead counsel. Counsel for Defendant NSAV shall obtain lead counsel by 8/15/24. WFD Capital LLC shall file any motion to intervene by 8/22/24. Defendant NSAV was admonished that it must IMMEDIATELY comply with the Court's prior orders dated 6/26/24 [167] [168]. By 8/14/24 at 4:00 CST, Defendant NSAV shall file a status report updating the Court on its compliance with the prior orders. Specifically, NSAV must "identify and describe, in complete detail, with all relevant information, writing and under oath, by an authorized officer of each such Defendant and Enjoined Defendant, the custodian, location amount, and all complete details, data and information, as to any and all shares of common stock and/or other classes of stock of each Defendant and Enjoined Defendant, as held from September 23, 2021 to the date of the Order, and deliver any and all documentation regarding, relating or supporting the same, by Defendant NSAV and as certified, under oath and by the pains and penalties of perjury, by the Chief Executive Officer of Defendant NSAV" and "identify and describe, in complete detail, with all relevant information, writing and under oath, by an authorized officer of each such Defendant and Enjoined Defendant, the custodian, location amount, and all complete details, data and information, as to any and all assets, monies, credits, rights, contracts and/or things, tangible and/or intangible, that have been removed, sold, encumbered, hypothecated, conveyed, transferred, assigned and/or moved, directly or indirectly, from the Defendants and the Defendant–Agents since the commencement of this litigation" [168] at 4. Defendant Tilton's motion to vacate [172] is denied for the reasons stated at the hearing. Defendant Tilton was advised that he is covered by the Court's orders [167] [168] as an officer of the Corporate Defendants, but not in his personal capacity. Mailed notice. (dm,)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

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